Amendment dated May 9, 2008 Reply to Office Action of January 11, 2008

REMARKS

Docket No.: 21333/0209196-US0

Claims 1-27 are pending. By this Amendment, Claims 1-2, 13, 18, and 20-22 are amended.

In the Office Action, the Examiner rejects Claims 1-3, 8-9, 12-14 and 17-23 under 35 U.S.C. § 103(a) over U.S. Patent No. 6,522,783 to Zeng (Zeng) in view of U.S. Patent No. 5,502,458 to Braudaway. This rejection is respectfully traversed.

Contrary to the Examiner's assertion on page three of the Office Action, Zeng at column 1, lines 27-38 does not in fact disclose or suggest using a hash function to determine an index. Zeng does disclose that index numbers are associated with pixels, but Zeng does not disclose or suggest how that association is formed. As noted for example in Wikipedia, a hash function is a well-defined procedure or mathematical function that turns some kind of data into a relatively small integer. Zeng does not disclose or suggest such, or using such. Accordingly, Zeng fails to disclose or suggest "building an intermediate table for storing the input color data for each pixel in the group, wherein each different input color data corresponding to a pixel in the group is assigned an index in the intermediate table and wherein the index is a hash function of the different input color data" as recited in Claim 1, and similar features recited in independent Claims 13, 18, 20. Braudaway fails to overcome this deficiency of Zeng.

In addition, Applicant notes that Braudaway discloses palettizing an image only once using a display-independent palette, and computing a display-specific palette only once for each display. In effect, the display-specific palette is a conversion from the display-independent palette. Thus when an image palettized with the display-independent palette is received for showing on a particular display, wherein the palettized image contains indices from the display-independent palette, those indices are applied to the display-dependent palette to obtain signal or values that when applied to the particular display, will cause the display to correctly render or reproduce the image. This also means that Braudaway discloses computing a conversion (the display-dependent palette) only once for a particular display, and not each time a new image is reproduced by the display.

Accordingly, Braudaway fails to disclose or suggest "repeating for each of multiple groups of pixels in the input color space the steps of providing, building an intermediate table, storing, building an intermediate palette, converting, and substituting" as recited in Claim 2, where for example the step of converting comprises "converting the color data in the intermediate palette to an output color data in an output color space, wherein the same input color data in different pixels is converted once to avoid repeated conversion calculations for the different pixels having the same input color data" as recited in Claim 1. Braudaway likewise fails to disclose or suggest similar features recited in dependent Claim 21. As acknowledged by the Examiner, Zeng also fails to disclose or suggest converting data in a palette.

Finally, Applicant notes that Zeng does not appear to disclose or suggest the intermediate table recited in each of independent Claims 1, 13, 18 and 20. The Examiner cites Figure 1 and column 1, lines 33-38 of Zeng, but Zeng merely discloses a palette table 30, which appears to correspond to the claimed intermediate palette, and an index image 32 which appears to correspond to the claimed index array. However, Zeng does not appear to disclose or suggest the claimed and separately recited intermediate table.

For at least the above reasons, Zeng and Braudaway, when considered both separately and in combination, fail to disclose or suggest Claims 1-3, 8-9, 12-14 and 17-23. Withdrawal of the rejection of Claims 1-3, 8-9, 12-14 and 17-23 under 35 U.S.C. § 103(a) over Zeng in combination with Braudaway is respectfully requested.

In the Office Action, the Examiner also rejects Claims 4-5, 10-11, 16 and 24-25 under 35 U.S.C. § 103(a) over a combination of Zeng, Braudaway and U.S. Patent No. 5,579,031 to Liang (Liang). Liang fails to overcome the deficiencies of Zeng and Braudaway described above, and therefore Claims 4-5, 10-11, 16 and 24-25 are allowable for at least the same reasons as independent Claims 1, 13, 18 and 20. Withdrawal of this rejection is requested.

In the Office Action, the Examiner also rejects Claims 6-7, 15 and 26-27 under 35 U.S.C. § 103(a) over a combination of Zeng, Braudaway and U.S. Patent No. 5,668,890 to

Docket No.: 21333/0209196-US0

Winkelman (Winkelman). Winkelman fails to overcome the deficiencies of Zeng and Braudaway described above, and therefore Claims 6-7, 15 and 26-27 are allowable for at least the same reasons as independent Claims 1, 13, 18 and 20. Withdrawal of this rejection is requested.

CONCLUSION

Applicant respectfully submits that the application is in condition or allowance. Favorable consideration on the merits and prompt allowance are respectfully requested. In the event any questions arise regarding this communication or the application in general, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

Dated: May 9, 2008 Respectfully submitted,

M. David Ream

Registration No.: 35,333

DARBY & DARBY P.C.

P.O. Box 770

Church Street Station

New York, New York 10008-0770 (206) 262-8900 • (212) 527-7701 fax

Attorneys/Agents For Applicant